

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL CASE NO. 04-10231-MLW
)
PETER V. MAGGIO, III, *ET AL.*)
)

)

**GOVERNMENT'S MOTION TO EXTEND TIME
FOR SENTENCING MEMORANDUM**

The government moves this Court for an extension of time to file its Sentencing Memoranda. The Government is preparing its responses to sentencing memoranda filed by each of the six defendants, including memoranda the Government did not receive until October 10th, and needs additional time to complete the memoranda.

In some instances, the Government's memoranda will be brief, stating the Government's position with regard to overarching issues of application of guidelines for "sophisticated means", "relevant conduct" and other factors calculated by the Probation Department. However, certain defendants filed lengthy, fact-specific assertions which require extensive review to fully inform this Court of the evidence.

WHEREFORE, the Government moves this Court for leave to file its sentencing memoranda on or before **Tuesday, October 17, 2006**.

Respectfully submitted this 13th day of October, 2006.

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By: /s/ Victor A. Wild

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CERTIFICATE OF SERVICE

I, Victor A. Wild, Assistant United States Attorney, do hereby certify that this document, filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non registered participants on this date.

/s/ Victor A. Wild
VICTOR A. WILD
Assistant U.S. Attorney